

ESTTA Tracking number: **ESTTA539657**

Filing date: **05/23/2013**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91209281
Party	Defendant Shenzhen Koradior Fashion Co., Ltd.
Correspondence Address	JOSEPH J VILLAPOL LADAS & PARRY LLP 1040 AVENUE OF THE AMERICAS NEW YORK, NY 10018-3738 UNITED STATES jvillapol@ladas.com,rroa@ladas.com,mmercado@ladas.com
Submission	Answer
Filer's Name	Joseph J. Villapol
Filer's e-mail	jvillapol@ladas.com,rcathcart@ladas.com,rroa@ladas.com,mmercado@ladas.com
Signature	/Joseph J. Villapol/
Date	05/23/2013
Attachments	Answer - Chrisitan Dior v. Shenzhen Koradior.pdf(484571 bytes )

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

	X	
	:	
CHRISTIAN DIOR COUTURE, S.A.,	:	
	:	
Opposer,	:	Opposition No. 91209281
	:	(Serial No. 79/117,194)
v.	:	
	:	
SHENZHEN KORADIOR FASHION CO., LTD,	:	
	:	
Applicant.	:	
	:	
	X	

**ANSWER TO NOTICE OF OPPOSITION**

Applicant alleges, through counsel, for its Answer to the Notice of Opposition as follows:

1. Applicant is without information sufficient to form a belief as to the truth of the allegations set forth in ¶ 1 of the Notice of Opposition, and, therefore, denies each and every such allegation.
  
2. Applicant is without information sufficient to form a belief as to the truth of the allegations set forth in ¶ 2 of the Notice of Opposition, and, therefore, denies each and every such allegation.
  
3. Applicant is without information sufficient to form a belief as to the truth of the allegations set forth in ¶ 3 of the Notice of Opposition, and, therefore, denies each and every such allegation.
  
4. Applicant admits that Exhibits 1 through 7 to the Notice of Opposition purport to be copies of printouts from the USPTO database of registrations owned by Opposer

and that such printouts speak for themselves. Applicant is otherwise without information sufficient to form a belief as to the truth of the allegations set forth in ¶ 4 of the Notice of Opposition, and, therefore, denies each and every such allegation.

5. Applicant is without information sufficient to form a belief as to the truth of the allegations set forth in ¶ 5 of the Notice of Opposition, and, therefore, denies each and every such allegation.

6. Applicant is without information sufficient to form a belief as to the truth of the allegations set forth in ¶ 6 of the Notice of Opposition, and, therefore, denies each and every such allegation.

7. Applicant is without information sufficient to form a belief as to the truth of the allegations set forth in ¶ 7 of the Notice of Opposition, and, therefore, denies each and every such allegation.

8. Applicant admits that China is its home country but is otherwise without information sufficient to form a belief as to the truth of the allegations set forth in ¶ 8 of the Notice of Opposition, and, therefore, denies each and every such allegation.

9. Applicant admits the allegations set forth in ¶ 9 of the Notice of Opposition.

10. Applicant is without information sufficient to form a belief as to the truth of the allegations set forth in ¶ 10 of the Notice of Opposition, and, therefore, denies each and every such allegation.

11. Applicant admits that Exhibit 8 to the Notice of Opposition purports to be a “screen shot” from Applicant’s website, [www.koradior.com](http://www.koradior.com), and that such document speaks for itself. Applicant otherwise denies the allegations set forth in ¶ 11 of the Notice of Opposition.

12. Applicant denies the allegations set forth in ¶ 12 of the Notice of Opposition.

13. Applicant admits that the granting of a registration confers certain statutory privileges but otherwise denies the allegations set forth in ¶ 13 of the Notice of Opposition.

14. Applicant denies the allegations set forth in ¶ 14 of the Notice of Opposition.

15. Applicant denies the allegations set forth in ¶ 15 of the Notice of Opposition.

16. Applicant admits that Exhibit 9 to the Notice of Opposition purports to be a printout from an online fashion magazine and that such document speaks for itself.

Applicant otherwise denies the allegations set forth in ¶ 16 of the Notice of Opposition.

17. Applicant denies the allegations set forth in ¶ 17 of the Notice of Opposition.

18. Applicant is without information sufficient to form a belief as to the truth of the allegations set forth in ¶ 18 of the Notice of Opposition, and, therefore, denies each and every such allegation.

19. Applicant denies the allegations set forth in ¶ 19 of the Notice of Opposition.

20. Applicant denies that registration of the subject mark would dilute Opposer's rights in its marks. Applicant is otherwise without information sufficient to form a belief as to the truth of the allegations set forth in ¶ 20 of the Notice of Opposition, and, therefore, denies each and every such allegation.

21. Applicant denies the allegations set forth in ¶ 21 of the Notice of Opposition.

22. Applicant denies the allegations set forth in ¶ 22 of the Notice of Opposition.

WHEREFORE, Applicant requests that Opposition No. 91209281 be dismissed and that registration be granted to Application Serial No. 79/117,194.

Respectfully submitted,

**LADAS & PARRY LLP**

Attorneys for Applicant

Dated: May 23, 2013

By: 

\_\_\_\_\_  
Joseph J. Villapol  
Ralph H. Cathcart  
1040 Avenue of the Americas  
New York, New York 10018  
(212) 708-1865

### **CERTIFICATE OF TRANSMISSION**

I, Reinaldo M. Roa, hereby certify that a copy of the foregoing ANSWER TO NOTICE OF OPPOSITION is being electronically transmitted to the United States Patent and Trademark Office on the date indicated:

Dated: May 23, 2013



Reinaldo M. Roa

### **CERTIFICATE OF SERVICE**

I, Reinaldo M. Roa, hereby certify that a copy of the foregoing ANSWER TO NOTICE OF OPPOSITION was served on the person(s) listed below by First-Class Mail, postage prepaid, on the date indicated below:

Philip H. Gottfried, Esq.  
Amster, Rothstein & Ebenstein  
90 Park Avenue  
New York, NY 10016

Dated: May 23, 2013



Reinaldo M. Roa